

Steven G. Rosales
Attorney at Law: 222224
12631 East Imperial Highway, Suite C-115
Santa Fe Springs, CA 90670
Tel: (562)868-5886
Fax: (562)868-5491
E-Mail:rohlfing_office@speakeasy.net

Attorneys for Plaintiff TATANISHA BAYLESS

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

TATANISHA BAYLESS,)	Case No. 3:10-CV-02562 JCS
)	
Plaintiff,)	SECOND STIPULATION EXTEND
v.)	TIME
)	
MICHAEL J. ASTRUE,)	
Commissioner of Social Security.)	
)	
Defendant.)	
)	

TO THE HONORABLE JOSEPH SPERO, MAGISTRATE JUDGE OF
THE DISTRICT COURT:

IT IS HEREBY STIPULATED by and between the parties, through their
respective counsel, that Plaintiff shall have a 30 day extension of time, to and
including April 27, 2011, in which to motion for summary judgment. While it is
not counsel's policy to request a second extension time, counsel reluctantly must
do so at this time. Counsel's case load in addition to a procedural error wherein
Denise Bourgeois Haley, the attorney to whom this matter was assigned has not
completed her admission to this court. Hence, the motion cannot be filed under her
name until admission is complete and Denise Bourgeois Haley's case load has not
allowed completion of this matter. While Denise Bourgeois Haley seeks to file the

1 motion for summary judgment before the due date, she seeks this second and final
 2 extension as the motion will not be done by March 28, 2011. In addition to other
 3 deadlines, Denise Bourgeois Haley will be unavailable until Wednesday, March
 4 30, 2011 due to a pressing family matter that is not local. She is leaving today and
 5 will not be returning until Wednesday March 30, 2011. This request is made
 6 solely at the request of Plaintiff's counsel. Counsel has acted diligently and in
 7 good faith in the preparation of this matter; however, counsel has not been able to
 8 comply with the current due date of March 28, 2011. Counsel respectfully request
 9 that additional time be allowed to Tatanisha Bayless to properly prepare a
 10 meaningful motion for summary judgment on her behalf and apologizes to the
 11 court for inconveniencing the court in any manner. Bayless respectfully requests
 12 that this request be granted.

13 DATE: March 24, 2011

Respectfully submitted,

14 LAW OFFICES OF LAWRENCE D. ROHLFING

15
 16 /s/ *Stephen G. Rosales*

17 BY: _____

Steven G. Rosales

18 Attorney for plaintiff Tatanisha Bayless

19
 20 DATE: March 28, 2011

Melinda Hagg

21 United States Attorney

22
 23 /s/ *Kathryn R. Watson*

24 BY: _____

Kathryn R. Watson

25 Attorneys for defendant Michael Astrue

1 IT IS HEREBY ORDERED that plaintiff may have an extension of time, to
2 and including April 27, 2011, in which Plaintiff's Motion for Summary Judgment;
3 Defendant may have an extension of time to May 20, 2011 to consider the
4 contentions raised in Plaintiff's Motion for Summary Judgment, and file any
5 opposition if necessary. Any reply by plaintiff will be due June 3, 2011.

6 IT IS SO ORDERED.

7 DATE: 03/29/11

